

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

vs.

CASE NUMBER: 8:12mj1193(AEP)

MICHAEL ALBERT MORTON

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. From on or about May 4, 2009, through present in the Middle District of Florida, defendant did,

commit aggravated identity theft, bank, mail and wire fraud, and use names other than his own to promote illegal scheme by means of Postal Service

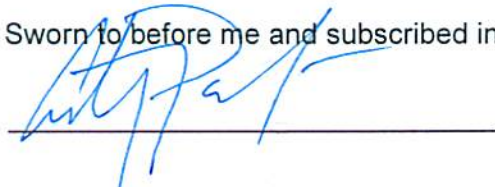
in violation of Title 18, United States Code, Sections 1028A, 1342 through 1344. I further state that I am a United States Postal Inspector with U.S. Postal Service, and that this Complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No


Signature of Complainant
John P. Ebsworth-Mojica
Special Agent U.S. Postal Service

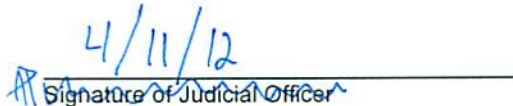
Sworn to before me and subscribed in my presence,



at

Tampa, Florida

ANTHONY E. PORCELLI
United States Magistrate Judge
Name & Title of Judicial Officer

4/11/12

Signature of Judicial Officer

AFFIDAVIT IN SUPPORT OF ARREST WARRANT

I, John P. Ebsworth-Mojica, being duly sworn, state as follows:

1. I am a United States Postal Inspector and have been so employed since August 2007. I investigate criminal activity involving or relating to the United States Postal Service ("USPS" or "Postal Service"), including identity theft, mail theft, mail fraud, and fraud or theft from the Postal Service. I am currently assigned to the Mail Fraud Investigations Team at the Tampa Field Office of the United States Postal Inspection Service ("USPIS").
2. I have been involved in the investigations of more than 40 cases involving mail fraud and/or identity theft. I have also assisted other law enforcement agencies in developing intelligence about individuals who conceal their identities or assume other identities. Furthermore, I have attended approximately 80 hours of training regarding the investigation of bank fraud, mail fraud and identity theft. Based on my training and experience in the investigation of bank fraud, mail fraud and identity theft and providing assistance with locating fugitives who may be concealing or changing their identities, I have become familiar with the manner and mean by which individuals conceal their identity or assume other identities.
3. I am currently involved in an investigation of Michael Albert Morton regarding his suspected violation of Title 18, United States Code, Section 1028A (Aggravated Identity Theft); Title 18, United States Code, Section 1342 (Using Names Other Than His Own To Promote Illegal Scheme By Means of Postal Service); Title 18, United States Code, Section 1343 (Wire Fraud); and Title 18, United States Code, Section 1344 (Bank fraud).
4. The information contained in this affidavit is made for the sole purpose of supplying probable cause to obtain an arrest warrant for Michael Albert Morton. Based on the information described below, there is probable cause to believe that Michael Albert Morton has committed the following criminal offenses: aggravated identity theft, in violation of 18 U.S.C. § 1028A; using names other than his own to promote illegal scheme by means of Postal Service, in violation of 18 U.S.C. § 1342; mail fraud, in violation of 18 U.S.C. § 1341; wire fraud, in violation of 18 U.S.C. § 1343; and bank fraud, in violation of 18 U.S.C. § 1344.
5. The information contained in this affidavit is based upon my personal knowledge, as well as information and documents provided to me in my official capacity. Because this affidavit is submitted for the limited purpose of establishing probable cause for an arrest warrant, it does not include all facts known to law enforcement agents and officers regarding this investigation.

Background of the Investigation

6. On or about May 4, 2009, I was contacted by the Senior Fraud Investigator for Chase Card Member Services who stated he had identified a fraudulent credit card with a mailing address of 2655 Ulmerton Road # 303, Clearwater, FL 33762, which he suspected to correspond to a Private Mail Box (PMB) serviced by The UPS Store, a Commercial Mail Receiving Agency (CMRA). The credit card was issued to identity theft victim, GC, at that address. The Senior Fraud Investigator for Chase stated that on March 31, 2009, the real GC contacted Chase Bank to report a fraudulent credit card account he discovered while reviewing his credit history. GC lives in Collegeville, PA and filed a police report with Penn State University PD regarding the fraudulent transactions. The Senior Fraud Investigator advised Chase Card Services closed the GC account for fraud with a loss of \$12,920.41
7. On May 4, 2009, I visited the UPS Store at 2655 Ulmerton Road, Clearwater, FL 33762 to obtain a copy of the CMRA's box holder application for PMB # 303 (PMB 303). A review of the PS Form 1583, Authorization to Receive Mail via an Agent, revealed the Private Mail Box was opened in the name of a business, "Checkpoint Tech" (sic), by a Michael Morton on January 23rd, 2008. The type of business was listed as "consulting" and the city and state of incorporation provided was "St Petersburg, FL." The following information was provided on the application: [REDACTED] (sic), Tampa, FL 33609 was provided as the applicant's home address; telephone number 248-[REDACTED] was provided as the applicant's contact number; and the email address morts100@hotmail.com was also provided. There were several names listed as authorized to receive mail at the PMB including the names of two of Morton's relatives: KM and SM. Two forms of identification were provided by Morton to open PMB 303: a U.S. passport in his name and a Florida driver's license number assigned to Michael Albert Morton. A color copy of the identifications was attached to the PMB file. I noted both identifications were assigned to a "Michael Albert Morton" with the same date of birth (DOB). The Florida driver's license card bore the same address above: [REDACTED] Tampa, FL 33609. I reviewed PMB 303 and noted one piece of U.S. Mail addressed to GC. I confirmed, via law enforcement databases, that the phone number provided above was assigned to Michael Morton.
8. On June 16, 2009, I spoke to GC, who stated he discovered the identity theft activity when he received a declination letter for an LL Bean credit card. GC stated he identified the JP Morgan Chase credit card, as well as an HSBC Bank credit card after reviewing a copy of his credit report. GC said he has not authorized anyone to apply for any type of credit line using his identifiers nor has he given permission to anyone to use any type of credit lines opened

using his personal identifiers. GC is currently retired and confined to the use of a wheelchair to get around while living with multiple sclerosis.

9. During the course of this investigation, I have learned the following:

- a) From October 1, 2008 to the present, Morton opened a total of nine (9) PMBs throughout Clearwater, Seminole, St. Petersburg and Tampa, Florida using his Florida driver's license as well as other personal identifiers with a total of at least sixty-four (64) fraudulent applications for credit cards made in other names using these PMB addresses.
- b) Morton is a Quality Assurance consultant who has worked for several IT Staffing Companies with clients in the Tampa Bay Area.
- c) Several of the compromised identities belong to employees of companies where Morton has worked on IT projects and several of the IP addresses captured at the time the fraudulent credit applications were submitted are traceable to companies where Morton has been working in an IT project.
- d) Morton's father, Michael J. Morton, was a helicopter pilot and a flight instructor who owned Morton Helicopter LLC in Taylor, Michigan. Michael Albert Morton was listed as a board member/officer.
- e) Morton's father died in 2004 in a helicopter crash. After his death, the company became inactive.
- f) Several identities compromised belong to flight instructors and/or pilots who trained with Morton's father.
- g) According to FAA officials, the agency policy until 2001 was to use the applicant's social security number as the default number for their Pilot Certificate. After 2001, applicants had the option of requesting a random number in lieu of their Social Security number for their Pilot Certificate. Pilots who received their Certificate number prior to 2001 could also request the FAA change their previously assigned Pilot Certificate to a random number.
- h) Morton is a frequent traveler.
- i) Morton's bank records also reveal a pattern of bank fraud committed by Morton by filing fraudulent transactions claims/disputes on merchant charges incurred by Morton on his own bank accounts while on international or domestic travel.
- j) Morton has received credit for the fraudulent claims/disputes on his bank accounts.
- k) Morton has been profiting from selling on eBay some of the merchandise he obtained by means of submitting fraudulent claims/disputes for transactions he completed using his own bank account(s).

Fraud Victim # 1 - LL

10. On June 4, 2009, Chase Card Services received an online application in the name of fraud victim LL (using his personal identifiers of DOB and SSN) using PMB # 376 located at 405 S Dale Mabry Hwy, Tampa, FL 33609 as a mailing address. The application was approved for a credit line of \$6,600.00.
11. On July 21, 2009, the LL Chase card was used as payment in the amount of \$63.98 for a flower arrangement with a Get Well Card with Message: "Love Michael" ordered via 1-800 Flowers.com to be delivered to SM at the Crittenton Hospital located at 1101 West University Dr, Rochester, MI 48307. SM is Morton's mother.
12. On July 31, 2009, the LL Chase credit card was charged \$16.47 for dry cleaning services at McNatts Cleaners located at 3732 Henderson Blvd, Tampa, FL 33609. I met with two McNatts Cleaners employees who positively identified Michael Albert Morton from a photo line up as the person who provided the LL Chase credit card as payment and signed the original receipt for the transaction on July 31, 2009. One McNatts Cleaners employee stated that the transaction was carried out via the Drive Thru and described a blue convertible as the vehicle being driven by "Mr. LL." I reviewed State of Florida Department of Motor Vehicle archives for the Florida driver's license number assigned to Morton and noted he has registered a 2007 Blue Mustang Convertible with Florida plate number [REDACTED] G.
13. On July 31, 2009 the LL Chase credit card was used to pre-pay reservations made for luxury accommodations for two (2) guests in the name of Michael Morton at the Caesars Windsor Hotel (checking-in on August 1st, 2009 and checking out on August 2nd, 2009) and the Cambridge Suites Hotel in Canada (August 4th, 2009 and checking out on August 6th, 2009).
14. On August 3, 2009, Morton's PNC Bank records for the account ending # 2669 revealed three (3) international cash withdrawals totaling \$834.16 were made from the Caesars Windsor Hotel.
15. On December 7, 2010, I interviewed fraud victim LL who stated he did not submit, nor authorize anyone to submit on his behalf, the applications for credit using the S Dale Mabry Hwy address. LL advised he earned his helicopter pilot certificate with flight instructor Michael J. Morton (Michael Albert Morton's father), who owned Morton Helicopters LLC in Troy, Michigan. LL said a flight instructor needs to certify and submit to the FAA an application for his student to be certified as a helicopter pilot. LL stated the application requires the student's personal identifiers to be submitted to the FAA.

16. Chase closed the LL credit card account for fraud with a loss of \$521.04

Fraud Victim # 2 - GC

17. On November 6, 2008, HSBC Bank received an online application in the name of fraud victim GC (using his personal identifiers of DOB and SSN) using PMB # 303 located at 405 S Dale Mabry Hwy, Tampa, FL 33609 as a mailing address. The application was approved for a credit line of \$12,825.

18. On December 4, 2008, the GC HSBC card was used to pay invoice # 024759, in the amount of \$140.75, at the Allied Tires & Service Store # 2543 located 3603 S Dale Mabry, Tampa, FL 33629. The invoice was assigned to the tire repair of a 2007 Blue Mustang with Florida Tag # [REDACTED] G (Morton's vehicle).

19. HSBC Bank closed the GC credit card account for fraud with a loss of \$2,022.76

Fraud Victim # 3

20. On August 9, 2011, fraud victim GR reported to USPIS that he received a letter from Citibank regarding a fraudulent Master Card credit card opened in his name. GR stated when he called Citibank's fraud department he was told by Citibank the mailing address for the account was in Saint Petersburg, Florida. GR provided a copy of the letter sent to him by Citibank regarding a Master Card account ending # 1287.

21. On August 10, 2011, I received information from Citibank regarding the GR Master Card account ending # 1287. The GR account was opened on July 28, 2011 with a mailing address of 200 2nd Ave South, Ste # 407, St Petersburg, FL 33701. The email address morts100@yahoo.com and phone number 813-[REDACTED] were provided as contact information for the GR account. The credit application for the GR account was received on July 28, 2011 at approximately 7:28 AM (CST) from IP address 74.118.5.254. The application was approved for a credit line of \$7,300. Only a charge of \$1.20 was posted to the account ending # 1287 on August 9, 2011, from a vending machine in St Petersburg, Florida. I identified the IP address 74.118.5.254 as a static IP address assigned to Cox Multi Media with a geographical location in Largo, Florida. I reviewed public records for Cox Multi Media in St Petersburg, Florida and noted Valpak® is a subsidiary of Cox Multi Media with facilities in Largo and St Petersburg, Florida.

22. On August 15, 2011, I spoke to the Valpak® Director of Security and Safety regarding the GR Master Card application submitted from IP Address 74.118.5.254 on July 28, 2011. The Valpak® Director of Security and Safety confirmed IP Address 74.118.5.254 is assigned to Cox Target Media and

Valpak®. The Valpak® Director of Security and Safety advised Michael Albert Morton is working for Veredus Corp, an IT consulting company, on a quality assurance project at Valpak®.

23. On September 13, 2011, I received from the Valpak® Director of Security and Safety a badge reader report for the access badge assigned to Morton. I reviewed the report and noted Morton entered the Valpak® facility on July 28, 2011 at 8:12 AM (EST) or 7:12 AM (CST). Morton was in the Valpak® facility when the credit application for the GR account was received on July 28, 2011 at approximately 7:28 AM (CST) or 8:28 AM (EST) from the Valpak® IP address 74.118.5.254.
24. On October 12, 2011, I visited The UPS Store # 3248 located at 200 2nd Avenue South, Saint Petersburg, FL 33701 to obtain a copy of the CMRA's box holder application for PMB # 407. A review of the PS Form 1583 revealed the PMB was opened in the name of a business, "Morts Enterprizes" (sic), on May 18, 2011. The following information was provided on the application: [REDACTED] Tampa, FL 33609 (same address as PMB 201, 210, 301, 303, 376, 437 and 444) was listed as the applicant's home address and business address; telephone number 813-[REDACTED] (same number provided on GR credit application) was listed as the applicant's contact number. The type of business was listed as "Software engin Consolt" (sic) and there were several names listed as authorized to receive mail at the PMB, including the names of fraud victims SN and JW. Two forms of identification were provided by Morton to open PMB # 407: a Florida driver's license assigned to Morton and a Lifetime Fitness Sports membership card issued to "Michael Morton." A photo copy of the identifications was attached to the PMB file. I noted the pictures on both identifications resembled the same subject, and through my work on this investigation, I can positively identify the subjects in the photograph(s) as Morton. The identifiers provided by Morton match those used to open PMB # 303, as well as the other seven (7) PMB opened by Morton in Clearwater, St Petersburg, Seminole and Tampa, FL.
25. The Yahoo! email address morts100@yahoo.com is an active account created on August 17, 2008 from Postal Zip code 33609 (Tampa, FL). This account is linked to Microsoft email address morts100@hotmail.com via an email forwarding communication channel.
26. The Microsoft email address morts100@hotmail.com is an active account created on February 2, 2000 from Postal Zip code 48098 (Troy, MI). This account is assigned to Mike Morton.
27. Citibank closed the GR account for fraud with a loss of \$1.20

Fraud Victim # 4 - DT

28. On September 12, 2011, I was notified by the Valpak® Director of Security and Safety that Morton's assignment at Valpak® had ended today. The

Valpak® Director of Security and Safety advised Morton's cubicle was cleaned out and there were several documents left behind.

29. On September 13, 2011, I met with the Valpak® Director of Security and Safety to review the documents left in Morton's cubicle. I noted a letter dated August 12, 2011 from Capital One's Customer Fraud Protection reference account ending # 1714 addressed to fraud victim DT at 407 200 2nd Ave S, Saint Petersburg, FL 33701 (a PMB).
30. On October 14, 2011, I received information from Capital One, regarding the DT Capital One account ending # 1714. Capital One confirmed receiving on July 14, 2011 at 8:57 AM (EST) an application for credit from the Valpak® IP address 74.118.5.254 on behalf of fraud victim DT using the mailing address 200 2nd Avenue South # 407, Saint Petersburg, FL 33701. The application was approved for a credit line of \$2,000.
31. On October 14, 2011, I reviewed the Valpak® badge reader report for the access badge assigned to Morton and noted he entered the Valpak® facility on July 28, 2011 at 8:35 AM (EST). Morton was in the Valpak® facility when the credit application for the DT Capital One account was received on July 14, 2011 at approximately 8:57 AM (EST) from the Valpak® IP address 74.118.5.254.
32. On October 14, 2011, I spoke to fraud victim DT regarding the Capital One account ending # 1714. DT reviewed his flight instructor records and confirmed that on January 13, 1998, he flew with a helicopter pilot by the name of Michael J. Morton (Morton's father). DT advised he gave Morton an endorsement to fly. DT said this endorsement required him to provide Morton with DT's pilot certificate number. DT stated as of December 1998 his pilot certificate number was still DT's Social Security number. DT advised that as a flight instructor he is required to maintain records of every endorsement he provides. DT said Morton's father provided him with the pilot certificate number assigned to Michael J. Morton, which coincides with Michael J. Morton's Social Security number.
33. Capital One closed the DT account for fraud with no loss.

Fraud Victim # 5 - MT

34. On March 6, 2012, I was contacted by the Chase Fraud Investigator regarding a \$100,000 fraud business credit application trend in Tampa, Seminole and St. Petersburg, Florida area. The Chase Fraud Investigator advised the cards were being mailed out to one (1) of four (4) addresses via 1st Class Mail. The Chase Fraud Investigator said he suspected the addresses of corresponding to Private Mail Boxes (PMB). The Chase Fraud Investigator advised the transactions involved the purchase of sports tickets

and local ATM withdrawal activity. The Chase Fraud Investigator stated he identified a total of nine (9) fraud accounts with a total loss for Chase of \$87,286.26 The Chase Fraud Investigator provided information regarding the fraud accounts.

35. On March 6, 2012, I reviewed and queried Law Enforcement databases with the information provided by the Chase Fraud Investigator and noted the following:
- The mailing address 200 2nd Avenue South # 407, Saint Petersburg, FL 33701 (the same PMB used for the GR Citibank and the DT Capital One fraud accounts) was provided for three (3) of the nine (9) fraud accounts identified by Chase.
 - Morts Enterprises, Inc. and Morton Solutions, Inc. were company names used to submit a total of four (4) of the nine (9) fraud business credit application. Both companies list Michael Morton as Director.
 - The applications were submitted using an individual's SSN and credit history as the basis for approving the credit line.
 - Three (3) fraud accounts were opened using the identity of individuals who hold FAA pilot certificates: MT, JH and CS.
36. On March 6, 2012, I reviewed information received to date for fraud victim MT and noted the following:
- On November 4, 2008, Michael Morton requested from Intelius.com (a data mining company) a Background Report, which included the person's tax number (Txn Identity) or Social Security Number (SSN), for fraud victim MT (including his DOB).
 - On November 6, 2008, Capital One received an online application on behalf of fraud victim MT (using his personal identifiers of DOB and SSN) using the PMB # 303 (opened by Morton). The MT application was approved for a credit line of \$2,000.00. Capital One closed the MT account for fraud with no losses incurred.
 - On December 8, 2010, I interviewed fraud victim MT who confirmed he first trained in helicopters at Morton's Helicopters, which is owned by Michael J. Morton Sr. (Michael Albert Morton's Father) approximately 15-16 years ago.
 - On July 21, 2011, Chase Card Services received an online application on behalf of fraud victim MT (same identifiers provided to Capital One on November 6, 2008) using the mailing address of 10801 Starkey Rd STE 104210 Seminole, FL 33777 (a PMB). The MT Chase card application was approved for a credit line of \$10,000.00.
37. On March 8, 2012, I visited The UPS Store # 5980 located at 10801 Starkey Rd Ste 104, Seminole, FL 33777 to obtain a copy of the CMRA's box holder application for PMB # 210. A review of the PS Form 1583 revealed the

Private Mail Box was opened in the name of a business, "Stanton Solutions Inc" (sic), by a Michael Morton on July 19, 2011. The type of business was listed as "consulting." The following information was provided on the application: [REDACTED], Tampa, FL 33609 was provided as the applicant's home address as well as the business address; telephone number 813-[REDACTED] was provided as both the applicant's and the business contact number; and the email address morts100@yahoo.com was also provided (same information previously used by Morton on prior applications). There were several names listed as authorized to receive mail at the PMB, including the names of fraud victims: SN and JW. Two forms of identification were provided by Morton to open PMB # 210: a Florida driver's license assigned to Morton and a Lifetime Fitness Sports membership card issued to "Michael Morton." A photo copy of the identifications was attached to the PMB file. I noted the pictures on both identifications resembled the same subject, and through my work on this investigation, I can positively identify the subjects in the photograph(s) as Morton. The identifiers provided by Morton match those used to open PMB # 303 and 407, as well as the other six (6) PMBs opened by Morton in Clearwater, St Petersburg, Seminole and Tampa, FL. I reviewed PMB # 210 and noted one piece of U.S. Mail addressed to fraud victim LL at Stanton Consulting.

38. Chase closed the MT account for fraud with a loss of \$6,031.45

Fraud Victim # 6 - EC

39. On March 6, 2012, I reviewed and queried Law Enforcement databases with the information provided by the Chase Fraud Investigator regarding a \$100,000 fraud business credit application trend in Tampa, Seminole and St. Petersburg, Florida area. I noted the following:

- The mailing address 10801 Starkey Rd STE 104210 Seminole, FL 33777 (the same PMB used for the MT Capital One fraud account) was provided for two (2) of the nine (9) fraud Chase accounts.
- Stanton Consulting, Inc. was the company name used to submit a total of two (2) of the nine (9) fraud business credit application.
- The applications were submitted using an individual's SSN and credit history as the basis for approving the credit line.
- One (1) fraud account was opened using the identity of an individual who worked for Valpak®, fraud victim EC.
- On October 24, 2011, Chase Card Services received an online application on behalf of fraud victim EC (using his personal identifiers of DOB and SSN) using the mailing address of 10801 Starkey Rd STE 104210 Seminole, FL 33777 (a PMB). The EC application was approved for a credit line of \$20,000.00.

40. On March 8, 2012, I visited The UPS Store # 5980 located at 10801 Starkey Rd Ste 104, Seminole, FL 33777 to obtain a copy of the CMRA's box holder application for PMB # 210. A review of the PS Form 1583 revealed the Private Mail Box was opened in the name of a business, "Stanton Solutions Inc" (sic), by a Michael Morton on July 19, 2011. The type of business was listed as "consulting." The following information was provided on the application: [REDACTED], Tampa, FL 33609 was provided as the applicant's home address as well as the business address; telephone number 813-[REDACTED] was provided as both the applicant's and the business contact number; and the email address morts100@yahoo.com was also provided (same information previously used by Morton on prior applications). There were several names listed as authorized to receive mail at the PMB, including the names of fraud victims: SN and JW. Two forms of identification were provided by Morton to open PMB # 210: a Florida driver's license assigned to Morton and a Lifetime Fitness Sports membership card issued to "Michael Morton." A photo copy of the identifications was attached to the PMB file. I noted the pictures on both identifications resembled the same subject, and through my work on this investigation, I can positively identify the subjects in the photograph(s) as Morton. The identifiers provided by Morton match those used to open PMB # 303 and 407, as well as the other six (6) PMB opened by Morton in Clearwater, St Petersburg, Seminole and Tampa, FL. I reviewed PMB # 210 and noted one piece of U.S. Mail addressed to fraud victim LL at Stanton Consulting.

41. On March 9, 2012, I visited the Courtyard by Marriott Hotel located at 3131 Executive Drive, Clearwater, Florida 33762 regarding two ATM transactions noted on the EC Chase Card that occurred on January 16, 2012. I examined the area where the ATM is located at the hotel and noted the machine is located in a corridor inside the hotel. To reach the ATM, a person would need to access the hotel via the hotel lobby unless they had a valid room key to gain access thru a key access side entrance. Once inside, visitors can exit the hotel via this side entrance. I reviewed the video surveillance for the January 16 transaction and noted the individual entered the hotel lobby wearing a dark colored back pack, a light blue t-shirt, dark sunglasses and a dark ball cap, who, based on my familiarity with this investigation, I can positively identify as Morton.

42. Chase closed the EC account for fraud with a loss of \$5,125.37

Morton's Personal Bank Account Fraud

A. Rolex Watch:

43. On June 11, 2010, Morton purchased a Rolex GMT Master Men's Wrist Watch Model WRXG1337 with Serial # M938523 at Hyde Park Jewelers of Las Vegas located at 3500 Las Vegas Blvd S. Forum Shops Ste L5, Las

Vegas, NV 89109. The total cost of the watch was \$10,404.63. Morton provided four (4) cards in his name to pay for this transaction: a Regions Bank Visa Check Card Ending # 3645, a PNC Bank Card Ending # 8584, a American Express Card Ending # 1003 and a US Bank Flex Perks Visa card Ending # 1841.

44. On June 18, 2010, Morton filed fraud claims/disputes on all four (4) of his cards for the June 11, 2010 transaction at Hyde Park Jewelers of Las Vegas. All charges were reversed and credited to Morton's accounts.
45. On September 29, 2010, the General Manager of the Hyde Park Jewelers of Las Vegas confirmed there had been a disputed transaction made by a customer named Michael Morton. The General Manager of the Hyde Park Jewelers of Las Vegas provided the original color copies of all four credit cards front and back in Michael Morton's name, as well as an original color copy of the identification provided by Morton – the U.S. passport in Morton's name.
46. American Express, PNC Bank, Regions Bank and US Bank charged off to fraud the disputes on Morton's accounts with a combined loss of \$10,404.63

B. Travel to Miami and Fort Lauderdale (Chase and Citibank Cards):

47. On August 18, 2010, the Morton Chase Visa Card ending # 9651 was used as payment for a purchase total of \$27.85 at the 7-11 Store # 26169, located at 2920 E Sunrise Blvd, Ft. Lauderdale, FL 33304. The purchase consisted of a \$9.99 DVD Movie and two six packs of beer (one Budweiser Light and one Corona Extra). The clerk visually confirmed the customer was at least 21 years old. The transaction was captured by the video surveillance system of the store. I reviewed the video surveillance for the August 18 transaction and noted the individual wearing a light blue Tampa Bay Rays Longoria T-Shirt, who, based on my familiarity with this investigation, I can positively identify as Morton.
48. On August 19, 2010, the Morton Chase Visa Card ending # 6835 was used as payment of \$224.00 at the Marriott BeachPlace Towers located at 21 S. Fort Lauderdale Beach Blvd., Fort Lauderdale, FL 33316. At the time the reservation was booked, the email address morts100@hotmail.com was provided. Morton requested an extra night stay on his original day of departure (8/19/2010) and after settling his first reservation, he provided Master Card with Account # ending in 5984 in his name. Michael Morton's FL driver's license was provided as a form of identification for both transactions per hotel policy. Morton's check-in and subsequent disputed transaction were captured by the video surveillance system of the hotel. I reviewed the video surveillance for the August 18 and 19, 2010 transactions and noted the individual wearing a light blue Tampa Bay Rays Longoria T-Shirt at check-in

on August 18, 2010 and a dark blue Tampa Bay Rays Price T-Shirt and Tampa Bay Rays ball cap when he extended his stay on August 19, 2010 who, based on my familiarity with this investigation, I can positively identify as Morton.

49. On August 19, 2010, the Morton Chase Visa Card ending # 6835 was used as payment for a purchase total of \$48.74 at the CVS Pharmacy # 5174, located at 1150 Northeast 26th Street, Wilton Manors, FL 33305. This transaction was not disputed by Morton. I reviewed the video surveillance for the August 19, 2010 transaction and noted the individual wearing a dark blue Tampa Bay Rays Price T-Shirt and Tampa Bay Rays ball cap who, based on my familiarity with this investigation, I can positively identify as Morton.
50. Also on August 19, 2010, the Morton Citibank card ending # 9295 was used as payment for \$3.49 at the 7-Eleven Store # 32881 located at 7901 West Commercial Boulevard, Tamarac, FL 33351. The transaction was captured by the video surveillance system of the store. I reviewed the video surveillance for the August 19 transaction and noted the individual wearing a bright red Hawaiian shirt who, based on my familiarity with this investigation, I can positively identify as Morton.
51. On August 20, 2010, the Morton PayPal Plus MasterCard by GE Money Bank ending # 5984 was used at check-in as payment of \$614.37 at the Loews Miami Beach Hotel located at 1601 Collins Ave, Miami Beach, FL 33139. A photo copy was made of Morton's Florida driver's license and PayPal Plus MasterCard ending # 5984 at the time of check-in. A black Mercedes Benz Model C63 AMG with Florida Tag # 946KHG was checked-in under this reservation (Loews Miami Beach Hotel Vehicle claim number 268422). On that same date, the Morton Citibank card ending # 9295 was provided for payment of \$564.42 to extend his stay at the Loews Miami Beach Hotel. The transaction was declined. Morton provided his Chase Visa Card ending # 6835 as payment. The charge was approved for a total of \$564.42. I reviewed State of Florida Department of Motor Vehicle archives for the Florida driver's license number assigned to Morton and noted he has registered a 2010 Black Mercedes Benz Model C63 AMG with Florida plate number [REDACTED]G.
52. Also on August 20, 2010, the Morton Citibank card ending # 9295 was used as payment of \$49.95 at the Loews Miami Beach Hotel located at 1601 Collins Ave, Miami Beach, FL 33139. A photo copy was made of Morton's Florida driver's license at the time of check-in. A black Mercedes Benz Model C63 AMG with Florida Tag # [REDACTED]G was checked-in under this reservation (Loews Miami Beach Hotel Vehicle claim number 268422).
53. On August 20, 2010, the Morton Citibank card ending # 9295 was used as payment of \$408.48 at the True Religion Brand Jeans Store # 4, located at 644 Collins Avenue, Miami Beach, FL 33139-6278. The charge was declined.

The Morton Chase Visa Card Ending # 9651 was provided as an alternate form of payment for the balance of \$408.48. The charge was also declined. The Morton US Bank Flex Perks Visa card Ending # 9707 was provided as the final form of payment and the charge was approved for the total of \$408.48. The transaction was captured by the video surveillance system of the store. I reviewed the video surveillance for the August 20 transaction and noted the individual wearing a bright red Hawaiian shirt who, based on my familiarity with this investigation, I can positively identify as Morton.

54. On August 21, 2010, Michael Albert Morton reported his Citibank Card ending # 9295 as lost or stolen and disputed all charges including the ones described above, for a total of \$1,593.90. Citibank charged off to fraud the disputes on Morton's accounts with a combined fraud loss of \$1,593.90.
55. On August 22, 2010, the Morton Chase Visa Card ending # 6835 was used again for payments of \$120.00 and \$511.77 at the Loews Miami Beach Hotel.
56. On August 23, 2010, Michael Albert Morton reported both Chase Visa Cards as lost or stolen and disputed several charges, including the ones described above, for a total of \$2,773.68 for the Visa Card Ending # 9651 and \$1,421.19 for the Visa Card Ending # 6835. Chase Card Services charged off to fraud both disputes on Morton's accounts with a combined loss of \$4,194.87

CONCLUSION

57. During the course of this investigation, I can summarize the following information regarding Morton's scheme to defraud:
 - a) From October 1, 2008 to the present, Morton opened a total of at least nine (9) PMBs throughout Clearwater, Seminole, St Petersburg and Tampa, Florida using his Florida driver's license as well as other personal identifiers.
 - b) From September 20, 2008, to the present, a total of at least sixty four (64) fraudulent applications for credit were submitted to American Express, Capital One, Chase Bank, Citibank, First Premier Bank and HSBC Bank using the mailing addresses of the nine (9) PMBs controlled by Morton.
 - c) A total of thirty four (32) fraudulent applications were approved with credit cards being mailed to the PMBs for a combined credit limit of \$252,225.
 - d) The confirmed fraud losses for this case at this time are \$100,843.34
 - e) Approximately thirty nine (39) different identities were used in this scheme to defraud.

- l) From March 16, 2007, to the present, Morton filed at least twenty six (26) fraudulent transaction claims/disputes on merchant charges totaling \$53,696.27 incurred by Morton *on his own bank accounts* while on international or domestic travel.
 - f) A total for the twenty six (26) fraudulent bank/credit card transaction claims/disputes that were approved, with charges being reversed and credited back to Morton's account with a combined fraud loss to American Express, Capital One, Citibank, Chase Bank, Fifth-third Bank (5/3rd Bank), Regions Bank, PNC Bank and US Bank of approximately \$53,329.04
58. Based upon the information contained in this Affidavit, I believe there is probable cause that Michael Albert Morton has violated Title 18, United States Code, Sections 1028A, 1342, 1343 and 1344.

FURTHER YOUR AFFIANT SAYETH NAUGHT.


John. P. Ebsworth-Mojica
U.S. Postal Inspector

Subscribed to and sworn before me this 11 day of April, 2012.


ANTHONY PORCELLI
United States Magistrate Judge